

1.0 INTRODUCTION

1.1 HOW TO READ THIS DOCUMENT

1 This document is not a summary of the facts from the vast literature on the
2 possible health effects of extremely low frequency (ELF) electric and magnetic
3 fields. There have been many such reviews, including some very recent ones
4 (NAS et al., 1997), (Portier & Wolfe, 1998). Therefore, the descriptions reported in
5 the Working Group Report published by the National Institutes of Environmental
6 Health Sciences (NIEHS) will not be reiterated. It is available in print and on the
7 web, although studies published since the deadline for inclusion in the NIEHS
8 document will be described. In reaching the herewithin conclusions, however, the
9 three reviewers will consider all studies.

10 In preparation for this evaluation, the California Electric and Magnetic Fields
11 (EMF) Program held a two-day epidemiology workshop to discuss some of the
12 most relevant epidemiological findings and methodological issues. The
13 proceedings of that workshop, which were pivotal to some of the conclusions
14 reported here, were published in a peer-reviewed Supplement (5) of the journal
15 *Bioelectromagnetics* on January 22, 2001. Those who had assisted in the drafting
16 of the 1999 NIEHS document were asked to provide updated versions of their
17 contributions to help the reviewers in preparation of brief tabular summaries of the
18 evidence for this document. The reader will find that chapters 1, 2, 3, and 7 cover
19 in somewhat more detail areas covered in the Overview and Rationale of
20 Conclusions. The latter was meant to be a brief summary of the entire document.
21 The other chapters go into detailed discussions of the various streams of
22 evidence and particular disease endpoints.

1.2 WHAT IS NEW IN THIS EVALUATION

NEW EVIDENCE

23 There have been many adequate reviews, including some very recent ones (NAS
24 et al., 1997); (Portier & Wolfe, 1998); (IARC, 2001). The NIEHS review, in
25 particular, was regarded as the starting point for this evaluation. Their NIEHS
26 Working Group carried out their evaluation in June 1998. Several important
27 studies have been published between the conclusion of the NIEHS Working
28 Group review and this evaluation, including three major studies on childhood
29 leukemia (Green et al., 1999b), (Green et al., 1999a), (McBride et al., 1999),

30 (UKCSS, 1999). The deadline for including studies in this evaluation was June 24,
31 2000. This is later than the deadline originally mentioned in the Risk Evaluation
32 Guidelines (REGs). Since the Department of Health Services evaluation began later
33 than initially envisaged, the reviewers felt that it was unwise to disregard recently
34 published, and possibly important, studies simply to observe a previously set but
35 otherwise arbitrary date. Only one large study (van Wijngaarden et al., 2000) that
36 dealt with suicide emerged during this extended deadline period.

37 In addition, the reviewers considered studies sponsored by the California EMF
38 Program (Li et al., 2002), (Lee et al., 2002) and in the Epidemiology Workshop
39 satisfying the criteria for inclusion in this evaluation, as specified in the Guidelines.
40 In this final draft the DHS scientists also discuss articles that were brought to their
41 attention during the public comment period (see Appendix 6 for additional
42 references considered).

43 The document has features that were not present in the NIEHS document. One of
44 these—presenting a graded degree of certainty of causality—is described below.
45 Also discussed are the aspects that make up the EMF mixture that characterizes the
46 exposure of persons who come near the power grid, the internal wiring of houses,
47 and common household appliances. These are described in Chapter 3. The
48 reviewers stress the notion of “mixture” because different aspects of EMF exposure
49 (e.g., 60-cycle magnetic fields and high frequency transients) would require different
50 actions for abatement. For each of the diseases considered, there are explicit
51 discussions about whether the epidemiological associations observed, if real, would
52 convey a risk from lifetime exposure that would be of regulatory interest. This is a
53 parameter of interest to the social justice policy framework, which focuses on the
54 individual risks of the most highly exposed. In Chapter 21 at 21.5, the baseline
55 mortality for conditions considered possibly associated with EMFs are discussed.
56 The reviewers ask if the attributable burden of mortality from even a very small
57 fraction of that baseline would be of regulatory interest when compared to the
58 mortality burden thought to be avoided by regulation of other agents. The
59 attributable burdens of mortality or morbidity are parameters of interest to the
60 utilitarian policy framework, which aims at the most good for the most people at the
61 least cost. The document also attends to any evidence suggesting inequitable
62 exposure or vulnerability to EMFs. This is relevant to the environmental justice
63 policy framework, which is concerned with unfair distributions of risk.

64 Each health condition considered had at least two epidemiological studies in which
65 there was a statistical association with some surrogate for EMF exposure. The list of
66 conditions is similar to that discussed in the NIEHS document and includes:

- 1 • Adult and childhood leukemia
- 2 • Adult and childhood brain cancer
- 3 • Male and female breast cancer
- 4 • EMF as a “broad spectrum” carcinogen for all cancers
- 5 • Miscarriage
- 6 • Other reproductive and developmental conditions
- 7 • Amyotrophic lateral sclerosis (Lou Gehrig's Disease)
- 8 • Alzheimer's disease
- 9 • Acute myocardial infarction
- 10 • Suicide
- 11 • Other adverse non-cancer health outcomes (depression, electrical
- 12 sensitivity)

1.3 QUALITATIVE BAYES OR DEGREE OF CERTAINTY APPROACH TO EVALUATION

13 The DHS scientists found the usual process of describing the pattern of evidence
 14 in some detail and then expressing an opinion (without explaining the rationale for
 15 that opinion) to be insufficiently transparent. Accordingly, they supplement the
 16 usual International Agency for Research into Cancer (IARC) procedure with an
 17 additional form of presentation and an additional form of judging whether EMFs
 18 are a cause of disease. The following table shows the questions that were
 19 systematically addressed. For definitions of epidemiological terms in the table see
 20 pages 20-22 (Sections 12.1.1 -12.1.3).

TABLE 1.1 QUESTIONS RELEVANT TO DEVELOPING A DEGREE OF CERTAINTY ABOUT CAUSALITY

EXPLANATIONS OF A STATISTICAL ASSOCIATION OTHER THAN A CAUSAL ONE
<i>Chance: How likely is it that the combined association from all the studies of EMF and disease is due to chance alone?</i>
<i>Bias: How convinced are the reviewers that EMFs rather than a study flaw that can be specified and demonstrated caused this evidentiary pattern? If no specified and demonstrated bias explains it, how convinced are they that EMFs caused these associations rather than unspecified flaws?</i>
<i>Confounding: How convinced are the reviewers that these disease associations are due to EMFs rather than to another specified and demonstrated risk factor associated with EMF exposure? If not due to a specified risk factor, how convinced are they that they are due to EMFs rather than to unspecified risk factors?</i>
<i>Combined effect: How convinced are the reviewers that these disease associations are due to EMFs rather than to a combined effect of chance and specified or unspecified sources of bias and confounders?</i>
ATTRIBUTES SIMILAR TO HILL'S (HILL, 1965) THAT ARE SOMETIMES USED BY EPIDEMIOLOGISTS TO EVALUATE THE CREDIBILITY OF A HYPOTHESIS WHEN NO DIRECT EVIDENCE OF CONFOUNDING OR BIAS EXISTS
<i>Strength of association: How likely is it that the meta-analytic association is strong enough to be causal rather than due to unspecified minor study flaws or confounders?</i>
<i>Consistency: Do most of the studies suggest some added risk from EMFs? How likely is it that the proportion of studies with risk ratios above or below 1.0 arose from chance alone?</i>
<i>Homogeneity: If a large proportion of the studies have risk ratios that are either above or below 1.0, is their magnitude similar (homogeneous) or is the size of the observed effect quite variable (heterogeneous)?</i>
<i>Dose response: How clear is it that disease risk increases steadily with dose? What would be expected under causality? Under chance, bias, or confounding?</i>
<i>Coherence/Visibility: How coherent is the story told by the pattern of associations within studies? If a surrogate measure shows an association, does a better measurement strengthen that association? Is the association stronger in groups where it is predicted? What would be expected under causality? Under chance, bias, or confounding? How convinced are the reviewers that the magnitude of epidemiological results is consistent with temporal or geographic trends?</i>
<i>Experimental evidence: How convincing are the experimental pathology studies supporting the epidemiological evidence? What would be expected under causality, bias, chance, or confounding?</i>
<i>Plausibility: How convincing is the mechanistic research on plausible biological mechanisms leading from exposure to this disease? What would be expected under causality, chance, bias, or confounding? How influential are other experimental studies (both in vivo and in vitro) that speak to the ability of EMFs to produce effects at low dose?</i>
<i>Analogy: How good an analogy can the reviewers find with similar agents that have been shown to lead to similar diseases? What would be expected under causality, chance, bias, or confounding?</i>
<i>Temporality: How convinced are the reviewers that EMF exposure precedes onset of disease and that disease status did not lead to a change in exposure?</i>
<i>Specificity and other disease associations: How predominantly are EMFs associated with one disease or subtypes of several diseases? What would the reviewers expect under causality, chance, bias, or confounding? How much is their confidence in EMF causality for disease X influenced by their confidence that EMFs cause disease Y?</i>

1 As a heuristic device, and following Hutcinson and Lane (Hutchinson & Lane,
2 1980), the REGs suggested that these questions about the pattern of evidence be
3 posed so that one could say the pattern is more likely under the hypothesis that
4 EMFs contributed to the cause of that health condition or more likely under the
5 hypothesis that chance, bias, or confounding produced the pattern. This allows the
6 reviewers to provide the reader a rationale for the relative weight given mechanistic,
7 animal pathology, and epidemiological evidence, and to understand which parts of
8 the evidence suggest causality and which speak against causality.

9 The DHS reviewers coined the term "Qualitative Bayes Approach" to characterize a
10 form of verbally justifying judgments about hazard that paid attention to the insights
11 of Thomas Bayes, an 18th-century mathematician. His insights would suggest
12 starting with some initial degree of certainty that any given agent is capable of being
13 harmful based on knowledge about agents in general. Evidence is then
14 accumulated on this specific agent and this changes the degree of suspicion or
15 certainty.

16 Imagine a prehistoric hunter deciding whether to try some jungle fruit he has never
17 seen before. He has an initial degree of suspicion high enough that he does not
18 partake right away. He takes some fruit home and feeds it successively to several
19 types of captured birds. As each species seems to survive, it seems less and less
20 likely that the fruit would be harmful to humans. But since the leaves of the tree
21 bearing that fruit resemble those from a tree that bears a poisonous fruit (causing
22 the initial suspicion to be very high) the hunter's specific experiments might still
23 leave him fairly suspicious and lead him to cruelly feed the fruit to a captive from
24 another tribe. Only if the captive survived would his initial suspicions be allayed.
25 This example illustrates Thomas Bayes's two key insights: As evidence builds we
26 update our degree of certainty of harm, but at any point in time, that updated degree
27 of certainty also depends on how suspicious we were initially. This idea is
28 expressed mathematically by a simple formula.

29 Initial Odds * Relative Likelihood of Evidence = Updated Odds

30 The first term of the Bayes formula is the prior odds, that is, the odds that a given
31 hypothesis is thought to merit *a priori*, before examining the evidence. In this
32 document it is called the "prior" because it is not based on subsequent research.

33 The second term, the "relative likelihood," is a multiplier, calculated (or, in this case,
34 qualitatively discussed) after scientific evidence has been collected and evaluated.
35 The term "relative likelihood" is most properly restricted to the case where one
36 compares the statistical likelihood of a result under one specific hypothesis relative

37 to that under another hypothesis, usually the null. It expresses the likelihood of the
38 observed pattern of evidence if EMFs do indeed cause disease, divided by the
39 likelihood of that pattern if EMFs do not cause disease. The third term, the
40 posterior, is the product of the first two and represents the odds of the risk being
41 true after the prior has been modified by our evaluation of the evidence.

42 It has been pointed out (Royall, 1997) that policy-relevant evidence evaluation
43 involves at least two very different questions, which often are confused. In the EMF
44 context, these two questions are: (1) Does the evidence developed specifically
45 about EMFs support the "hazard" hypothesis more than the "no-hazard"
46 hypothesis?; and (2) How probable is it that EMFs are a hazard? Royall makes the
47 case that the first question can be answered by inspecting the statistical relative
48 likelihood or Bayes Factor to see if it is greater than 1.0 and, if so, by how much.
49 Others (Lindley, 2000) would argue that non-experimental examples require
50 consideration of biases and confounding and not a mere consideration of the
51 relative likelihood of non-chance vs. chance. So, when the reviewers talk
52 heuristically about the strength of the evidence as a question separate from
53 Question 2, below, they mean their overall assessment of the relative likelihood of
54 the evidence after considering bias, confounding, and chance. The reviewers use
55 this construction even though it would not be easy to quantify and they do not
56 attempt to do so as a separate step.

57 The second question requires considering both the prior and the strength of
58 evidence. As noted, if the prior is very small, the usual run-of-the-mill strength of
59 evidence will not be sufficient to convince us that the posterior probability of an
60 EMF hazard is large.

61 Because of the difficulty of translating complex evidence into numbers, the
62 reviewers only use the ideas behind the formula as a way of explaining how certain
63 or uncertain they were to begin with and to explain the basis for the weights they
64 gave a particular stream of evidence in order to update our degree of certainty.
65 The Bayesian perspective used by the California reviewers recognizes that a
66 reassuring pattern of evidence from a stream of evidence that often misses a
67 harmful effect does not allay one's suspicion much, even though an alarming
68 pattern of evidence from that same stream of evidence might increase suspicion a
69 lot. Going back to the hunter-gatherer example: if birds sometimes survive eating
70 fruits that are lethal to humans, then reassuring evidence from bird experiments
71 would not allay suspicion as much as the death of the birds after eating the fruit
72 would increase our suspicion. In the terminology of probability, the relative
73 likelihood conveyed by a positive or negative result depends on the false-positive
74 rate and false-negative rate characteristic of that stream of evidence. The

1 mathematical basis for this insight is discussed in the REGs
2 (www.dhs.ca.gov/ehib/emf). It resulted in realizing that any stream of evidence,
3 judged by the extent to which it usually produced false-positive and/or false-negative
4 results, could be classified into four possible types: 1) capable of strengthening OR
5 weakening one's certainty, 2) predominantly capable of strengthening certainty (like
6 the bird feeding example given above), 3) predominantly capable of weakening
7 certainty and, 4) uninformative, neither capable of strengthening nor weakening
8 one's confidence. While this structured discussion helped organize the reviewers'
9 judgments, it did not involve a mathematical combination of weights as would be the
10 case in a quantitative Bayes evaluation. It should be noted that the Hill's attributes
11 are like the bird feeding example. If they are present they strengthen confidence, but
12 if they are absent, confidence falls only a little.

13 In the "Qualitative Bayes Approach," the DHS reviewers elicited their own expert
14 judgment about the *a priori* (initial) probability of hazard after a special training
15 session on how to avoid common errors of probabilistic estimation. It was important
16 to be explicit about the prior probability because some physicists were arguing on

17 the basis of physical theory applied to simplified biological models of the cell, that
18 any biological effect from residential EMFs was impossible and thus had a
19 vanishingly small initial credibility. This meant that they would require
20 extraordinarily strong specific evidence to change their initial impression. Previous
21 risk assessments have not explicitly considered this issue.

22 The discussion then turns to the patterns of specific EMF evidence in biophysical,
23 mechanistic, animal pathology, and epidemiological streams of evidence.
24 Obviously, if all four streams of evidence pointed toward or away from an EMF
25 effect, the reviewers' job would be easy. But what if some streams of evidence are
26 supportive and some are not? What weight should be given each stream of
27 evidence? It was in the effort to address this problem that discussions of the
28 inherent proclivity to give false positive and negative results came into play. This
29 discussion was guided by a series of pre-agreed-upon questions described in the
30 table above. The discussion included pro, con, and summary arguments. An
31 example of such arguments are presented in the next table:

TABLE 1.2 EXAMPLE OF PRO, CON, AND SUMMARY ARGUMENT

CHANCE		
AGAINST CAUSALITY	FOR CAUSALITY	COMMENT AND SUMMARY
(A1) Not all the associations (relative risks) are above 1.00 or statistically significant.	(F1) The narrow confidence limits in the meta- analytic summaries and the low likelihood of this pattern of evidence by chance leans away from chance as an explanation.	(C1) A non-chance explanation must be sought.

32 Considering this kind of structured discussion helped organize the reviewers'
33 judgments, after they weighed all the information in the usual way, although it did
34 not involve a mathematical combination of weights as would be the case in a
35 quantitative Bayes evaluation. After consideration of this carefully structured
36 discussion of the evidence (considering how much more—or less—likely the
37 pattern of evidence would be if the risk hypothesis were true compared to the
38 likelihood of that evidence if EMFs were safe), the reviewers expressed an expert
39 judgment on the posterior probability of a causal relationship.

1.4 QUALITATIVE BAYES RISK EVALUATION COMPARED TO TRADITIONAL AND QUANTITATIVE BAYES RISK EVALUATIONS

40 The traditional risk assessment has a section in which a judgment is given as to
41 whether the agent being evaluated is capable of causing cancer or some other
42 adverse health effect. This is called the "hazard identification." The typical
43 presentation is heavy in describing the relevant evidence and rather light in
44 explaining the rationale for the conclusion. Often the weight, given mechanistic,
45 animal pathology, and epidemiological streams of evidence, depends on a review

1 panel's interpretation of adjectives which best describe the pattern of evidence. For
2 example is the pattern of evidence "sufficient" or should it be called "limited"? Can
3 confounding and bias be "reasonably" discounted? Then there are pre-agreed-upon
4 rules for combining the streams of evidence. Limited animal evidence plus limited
5 epidemiological evidence results in one rank, sufficient animal evidence plus limited
6 epidemiological evidence leads to another rank, and so forth. The combinatorial
7 rules are straightforward, but the rationale for deciding that a stream of evidence is
8 "limited" is not clearly defined and is subjective.

9 A completely quantitative Bayesian approach of the sort proposed by McColl et al.
10 (McColl et al., 1996), or by Lindley (Lindley, 2000), would require assigning many
11 quantitative parameters to a complex Bayesian Net model which would
12 mathematically combine the subjectively assigned parameters to produce a
13 posterior degree of certainty of causality. To the reviewers' knowledge, this kind of
14 model has never been applied to any environmental agent and the DHS reviewers'
15 stakeholders urged them to opt for transparency rather than mathematical elegance.

16 In response to the third draft, the Electric Power Research Institute contracted with
17 Professor Sander Greenland in late 2001 to prepare a quantitative Bayesian model
18 based on the epidemiological evidence for childhood leukemia. Since his will be the
19 only extant quantitative Bayesian analysis, the reviewers contrast its proposed
20 approach to their own. His model will provide a posterior dose-response curve
21 based on a prior dose-response curve, the pooled epidemiological data, and prior
22 estimates of selection bias and non-differential measurement bias. The all-important
23 biophysical, mechanistic, and animal pathology streams of evidence will not be part
24 of Greenland's model, although they could influence the prior dose-response curve
25 in a subjective way. Calculations from Greenland's model would allow one to
26 provide a probability that the posterior slope of the dose-response curve is not flat,
27 that is, that there is some causal effect.

28 The following table compares the Qualitative Bayes evaluation to the traditional and
29 to Greenland's Quantitative Bayes approach to risk evaluation as to a number of
30 characteristics.

TABLE 1.3 COMPARISON OF USUAL RISK ASSESSMENT METHOD TO QUALITATIVE AND QUANTITATIVE BAYES METHODS

CHARACTERISTIC	USUAL METHOD	QUAL. BAYES	QUANT. BAYES
Evaluates all streams of evidence?	Sometimes	Yes	Focuses on epidemiology, other streams influence prior
Elicits prior probability?	No	Yes	Prior dose-response curve
Compares likelihood of each element of the evidence under the hazard and non-hazard hypotheses?	No	Qualitatively	Quantitatively with many of the parameters subjectively elicited
Pro, con, and summary arguments to make rationale transparent?	No, most risk assessments are skimpy in justifying hazard categories assigned	Yes	Not unless a supplementary document were to accompany the model
Combines relative likelihoods mathematically to derive posterior?	No	No	Yes, but non-epidemiological evidence is folded into the prior subjectively
Elicits an expert posterior probability after considering all elements of the evidence?	No	Yes	No
Displays judgments of various judges separately?	Usually strives for semblance of consensus	Yes	Technically possible for different experts to elicit their own parameters
Frames intermediate degrees of certainty as "not a proven hazard?"	Often	No, reveals posterior probability	No, reveals posterior probability

1 Both the Qualitative Bayes and the Quantitative Bayes evaluations can provide a
2 posterior degree of certainty that the epidemiological associations are causal, which,
3 if in the range from 10 to 90 out of 100, will not seem trivial to the general public and
4 will stimulate policy discussions. The statements, "possible," "there is no proven
5 hazard," or "there is no consistent evidence," often used for this range of degrees of
6 confidence, will not stimulate such discussions. Thus, both the Qualitative Bayes
7 and Quantitative Bayes methods pose risk communication "problems" for those who
8 believe that society should not begin policy discussions until most scientists are
9 virtually certain that a hazard exists. The traditional hazard identifications would
10 pose the same "problem" if they routinely used more nuanced categories of hazard
11 assessment that distinguished between, say, a certainty level of 11/100 and one of
12 89/100. As now framed they pose a risk communication "problem" for those who

13 believe that policy discussions should begin even before a hazard is firmly
14 established.

15 Compared to traditional qualitative evaluations, the Qualitative Bayesian approach
16 makes the evaluation more transparent, but it still accommodates different
17 opinions. The DHS reviewers have no doubt that critics of their conclusions could
18 use the Qualitative Bayes format to make their points. Some of the physicists who
19 believe that they have a theory to prove that no residential EMF effect is possible
20 would use priors so low that their posterior degrees of certainty would be low as
21 well; the toxicologists who believe reassuring animal tests prove that EMFs are
22 safe would make a case that the animal study results decrease their degree of
23 certainty of a hazard to a level below their initial degree of certainty. In a
24 contentious area such as EMFs, the reviewers doubt very much that any of the

1 three styles of risk evaluation discussed in the table would force a consensus
2 among subject matter experts who weigh and interpret the several streams of
3 evidence differently. Even in the Quantitative Bayes model experts will use different
4 priors and will elicit different subjective relative likelihood parameters for items like
5 bias and confounding, for which there is no direct evidence. In the traditional
6 method, experts will disagree on whether a stream of evidence warrants the
7 adjective "limited" or "sufficient," and in the Qualitative Bayes approach experts will
8 disagree on "how much more likely" the pattern of evidence is under the causal and
9 non-causal hypotheses. But the reasons for these different judgments will be more
10 transparent in the Qualitative Bayes style of risk evaluation and we believe that this
11 is desirable in controversial areas.

1.5 WHO DID THE EVALUATION AND WHAT FORM DID THE CONCLUSIONS TAKE?

12 On behalf of the California Public Utilities Commission (CPUC), three scientists who
13 work for the DHS were asked to review the studies about possible health problems
14 from electric and magnetic fields (EMFs) from power lines, wiring in buildings, some
15 jobs, and appliances. The CPUC request for review did not include radio frequency
16 EMFs from cell phones and radio towers. Reviewer 1, Vincent DelPizzo, Ph.D., is a
17 physicist and epidemiologist; Reviewer 2, Raymond Richard Neutra, M.D., Dr.P.H.,
18 is a physician epidemiologist; and Reviewer 3, Geraldine Lee, Ph.D., is an
19 epidemiologist with training in genetics. All three have published original research in
20 the EMF area and have followed the field for many years. To integrate and extend
21 their body of knowledge, the EMF Program contracted with specialists in biophysics,
22 statistics, and animal experimentation to prepare a background in critical literature
23 review in their respective fields to make sure that the literature review was up to
24 date through June 2000 (P Gailey Ph.D., G Sherman Ph.D., W Rogers Ph.D., and A
25 Martin Ph.D.). The first three were involved with the writing of the 1998 NIEHS
26 report. Furthermore, for each chapter of the review, another DHS epidemiologist or
27 toxicologist was asked to read the original literature and consulted extensively with
28 whichever of the three core reviewers was writing that chapter. This ensured that
29 the writer based his/her evaluation on an understanding of the evidence that was as
30 objective and consistent as possible. All three reviewers worked for the EMF
31 program for at least five years and to some extent they influenced each other's
32 thinking through their constant interaction and the review of each other's chapters.
33 All three did their reviews according to the guidelines that had been developed
34 earlier and approved by the program's Science Advisory Panel (SAP). The
35 Guidelines specified that the conclusions about any hazard should be done using
36 two systems. The first was developed by IARC and has been used by NIEHS. It
37 rates an agent as a "definite," "probable," "possible," or "not a" carcinogen, or

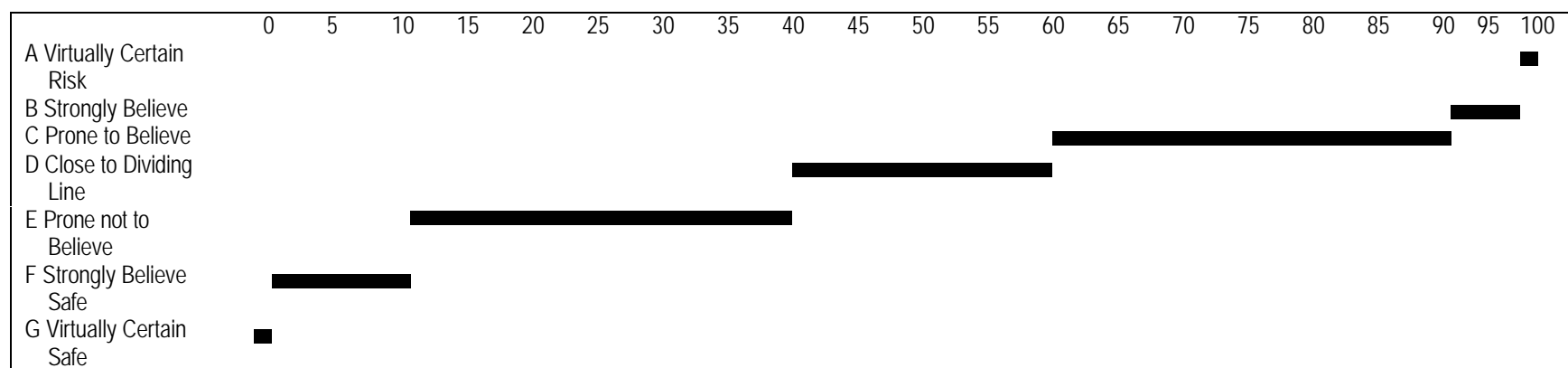
38 specifies that the evidence is "inadequate" to rate the agent. In addition, the
39 California Guidelines specified that in order to accommodate the probability-based
40 computer models of the program's policy projects each of the DHS reviewers
41 would individually assign a number between 0 and 100 to denote their degree of
42 certainty that epidemiological associations between EMFs and certain diseases
43 were causal in nature. The Guidelines, which were modified with advice from
44 public comment and the SAP and the DHS reviewers, attached pre-agreed-upon
45 English language phrases to various ranges of this degree of certainty. These are
46 presented below in Table 1.4.

47 If all three judges had best judgments above 50 out of 100, but that fell in different
48 categories in Table 1.4 judges were said to be "inclined to believe" that EMFs
49 increased the risk of that disease to some degree.

50 If they found themselves in different categories below that point, they were said to
51 be "inclined not to believe" that EMFs increased the risk of that disease to any
52 degree.

TABLE 1.4 EVERYDAY ENGLISH PHRASES TO DESCRIBE DEGREES OF CERTAINTY OF CAUSALITY (GRAPH ILLUSTRATES THE RANGE OF CERTAINTY NUMBERS TO WHICH THE PHRASES PERTAIN)

ARE THE HIGHEST EMFs AT HOME OR AT WORK SAFE, OR DO HIGH EMFs INCREASE THE RISK OF TO A DEGREE DETECTABLE BY EPIDEMIOLOGY?	DEGREE OF CERTAINTY ON A SCALE OF 1 TO 100
Virtually certain that they increase the risk to some degree	>99.5
Strongly believe that they increase the risk to some degree	90 to 99.5
Prone to believe that they increase the risk to some degree	60 to 90
Close to the dividing line between believing or not believing that EMFs increase the risk to some degree	40 to 60
Prone to believe that they do not increase the risk to any degree	10 to 40
Strongly believe that they do not increase the risk to any degree	0.5 to 10
Virtually certain that they do not increase the risk to any degree	< 0.5



1.6 DOES PHYSICAL THEORY MAKE AN EVALUATION UNNECESSARY?

1 A number of scientists (mainly physicists) have expressed the opinion that the
2 hypothesis that environmental EMFs are hazardous is intrinsically implausible and,
3 therefore, all empirical evidence supporting it must be regarded as artifactual. In the
4 Bayesian language, the prior—if not truly zero—is so vanishingly small that any
5 realistic value of the relative likelihood conveyed by the evidence will inevitably fail
6 to produce large posterior odds. Therefore, in their opinion, society should stop
7 paying attention to this issue altogether. The DHS reviewers do not agree with this
8 position. Because they did not find that the theoretical arguments were strong
9 enough to dismiss the hypothesis out of hand, they proceeded with the evaluation of
10 the evidence according to the REGs. Nonetheless, the reviewers do consider this
11 and other relevant arguments for large and small prior degrees of confidence that
12 EMFs might cause disease.